



HS&E CORPORATE SERVICES
Toxicology Department

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May 6, 2004

The Honorable Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA. 22116

Subject: Update - High Production Volume Chemicals Initiative

Dear Administrator Leavitt:

I am responding to a letter dated April 12, 2004 sent to me by Charles M. Auer of the EPA concerning Rhodia Inc.'s commitments on specific chemicals in the High Production Volume (HPV) chemical testing program. As a continuing participant in the HPV chemical testing program, Rhodia Inc. has volunteered to support the generation and reporting of data for many HPV chemicals that we produce or import. We have joined consortia with other companies and volunteered individually to perform the tasks requested under the initiative.

Specifically, Mr. Auer was asking about the status of our commitment to supporting the following chemicals:

| <u>CAS Number</u> | <u>Chemical Name</u> |
|-------------------|--|
| 122-52-1 | Phosphorous acid, triethyl ester |
| 137-20-2 | Ethanesulfonic acid, 2-[methyl[(9Z)-1-oxo-9-octadecenyl]amino]-, sodium salt |
| 1809-19-4 | Phosphonic acid, dibutyl ester |
| 61788-59-8 | Fatty acids, coco, Me esters |

The status of each of these chemicals is as follows:

- CAS # 122-52-1 On November 3, 2003, I sent a letter (attached) to then Acting EPA Administrator Horinko stating that Rhodia had learned that this chemical was already presented at SIAM 16 in May 2003. Therefore, it is unnecessary that Rhodia Inc. support this chemical under the HPV initiative.
- CAS # 137-20-2 Rhodia Inc. recently discovered that production and importation for this chemical was incorrectly calculated for IUR purposes and resulted in an over-report of this chemical. A corrected IUR has been submitted and a report to EPA has been accomplished. When this over-reporting is considered, it is clear that this product is not an HPV chemical. Therefore, Rhodia Inc. respectfully requests that this chemical be delisted from the HPV program.
- CAS # 1809-19-4 Rhodia Inc. will submit robust summaries and a test plan for DBHP (dibutyl hydrogen phosphite) before the end of 2004 to avoid issuance of a Test Rule. This is consistent with the guidance in the Agency's letter dated April 12, 2004. Rhodia plans to bridge data gaps for DBHP to data from structurally similar chemicals: phosphonic acid, dimethyl ester (DMHP; CAS # 868-85-9) and phosphonic acid, diethyl ester (DEHP; CAS # 762-04-9), and some additional data on these chemicals only recently became available to us. Further, Rhodia sponsored DMHP through SIAM18 (with Bayer) and the chemical was deemed to be "Low priority for further work" by the OECD.

- CAS # 61788-59-8 Rhodia Inc. is supporting this chemical in the ICCA HPV program through its membership in the APAG/Soap and Detergents Association (SDA) Fatty Esters consortium. Please contact Mr. Richard Sedlak at SDA to find out the status of the chemical and others being supported by the consortium. He can be reached at by telephone at 202.262.2561 or by e-mail at rsedlak@sdahq.org.

I continue to serve as Rhodia Inc.'s technical contact for the HPV initiative and look forward to your response. I can be reached at:

Glenn S. Simon, Ph.D., DABT
Rhodia Inc.
5171 Glenwood Avenue, Suite 402
Raleigh, North Carolina 27612

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Sincerely,

Glenn S. Simon, Ph.D., DABT
Director of Toxicology

Attachment: (Harinko letter 11/03/2003)

cc: Charles Auer, U.S. EPA
Steve Groome, Rhodia Consumer Specialties (UK)
Marcia Howes, Rhodia Inc.
Jim Keith, American Chemistry Council
Paul Larson, Rhodia Inc.
Karen Ranbom, Rhodia Inc.
Richard Sedlak, Soap and Detergents Association



HS&E CORPORATE SERVICES
Toxicology Department

November 3, 2003

The Honorable Marianne L. Harinko
Acting Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA. 22116

Subject: Update - High Production Volume Chemicals Initiative
Withdrawal of Support – CAS # 122-52-1

Dear Administrator Horinko:

As a continuing participant in the High Production Volume (HPV) chemical testing program, Rhodia Inc. is volunteering to support the generation and reporting of data for many HPV chemicals that we produce or import. We have joined consortia with other companies or volunteered individually to perform the tasks requested under the initiative.

Since I last wrote to the Agency, one change has occurred with respect to our commitments. WE have updated the ACC-sponsored website that concerns the HPV initiative, and we would ask that your staff please update the EPA HPV website accordingly.

- Concerning CAS # 122-52-1 triethyl phosphite; Phosphorous acid, triethyl ester; TEP), Rhodia has learned that this chemical was presented at SIAM 16 in May 2003. Therefore, we will no longer support this chemical under the HPV initiative.

I continue to serve as Rhodia Inc.'s technical contact for the HPV initiative. I can be reached at:

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Rhodia Inc.
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Sincerely,

Glenn S. Simon, PH.D., DABT
Director of Toxicology

cc: Charles M. Auer, U.S. EPA
Barbara Leczynski, U.S. EPA
Jim Keith, American Chemistry Council